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September 8, 1999

J. Maichle Bacon, M.P.H., R.S.
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Gordon Blum, Community Involvement Coordinator
Office of Public Affairs (P-19J)
U.S.EPA - Region 5
77 W. Jackson Blvd.
Chicago, IL 60604

RE: Proposed Cleanup Plan for Operable Unit 2 and Operable Unit 1 -
Pagel Pit Superfund Site

Dear Mr. Blum:

This is to register the comments and questions of this Department, after reviewing the summary document you made available to the community entitled "EPA Proposes Cleanup Plan for Operable Unit 2 and Changes to the Groundwater Remedy for Operable Unit 1 for the Pagel's Pit Superfund Site" (August 1999). Please be advised that these comments are being prepared without the benefit of the remedial investigation that was completed in the early 1990s. Your fact sheet indicated that this particular investigation (RI) involved both the Acme Solvent and the Pagel Pit sites. Comments are submitted in the order in which the issues appear in the EPA fact sheet.

Proposed Plan for OU 2

While the general direction of groundwater flow is to the west, there is some concern on the part of this Department, based on previous experience involving this site, that there may be localized flow components moving in a 360 degree direction moving away from the landfill, probably because of groundwater mounding underneath the landfill. This more than likely has been somewhat mitigated by improved landfill cover. Nevertheless, in the early 1980's a gas problem was identified east of Lindenwood Road affecting at least two neighboring homes with both landfill gas and a reduced groundwater pH associated with this gas. Localized groundwater flow may be doing the same thing.

The proposed "no action" alternative for groundwater contamination in the Southeast corner of the Pagel's Pit site leaves too many unknowns as to whether or not any portion of potential contaminants from the landfill may not be migrating, at least for short distances, up-gradient. This would be difficult if not

G. Blum

Page 2

9/8/99

impossible to detect based on the configuration of the existing monitoring wells. Consideration should be given to installing additional shallow piezometers immediately upgradient from the site on the near eastern side of Lindenwood Road.

Proposed Remedy Change for OU 1

The EPA proposed monitored natural attenuation for the groundwater west of Kilbuck Creek may or may not be adequate to prevent downgradient migration of contaminants beyond the confines of the Pagel Pit owned land. From the facts discussed, it seems to be acknowledged that landfill contaminants are part of both the local and regional (i.e., beyond Kilbuck Creek) groundwater flow patterns. Has the hydrogeology of the area been adequately characterized to predict with reasonable accuracy that there will not be contaminant migration beyond the landfill operator owned property? Does either the Kishwaukee and/or the Rock River represent potential long-range discharge points for any of these contaminants. If flow-path potential extends that far, there is some potential for many private wells to be influenced. Unfortunately, the fact sheet does not provide enough discussion of this regional groundwater flow picture to mitigate these concerns.

Proposed Low-Flow (Minimal Draw Down Groundwater Sampling Procedures)

There is some concern that the volume of water being purged would not greatly exceed the water capacity in the pump appurtenances (i.e., tubing, etc.). This creates a situation where there is the potential to be sampling water that has been in contact with the well casing as opposed to water migrating into the sample from outside the casing from the immediate aquifer environment. Perhaps, a better indicator of when to sample would be to monitor the draw-down in the static water level during the purging process. Once this water level has stabilized, sampling could commence.

Thank you for opportunity to provide these comments and to raise the questions posed.

Sincerely,



J. Maichle Bacon
Public Health Administrator



Ruth Roth
Groundwater Protection Coordinator

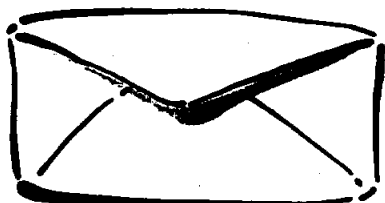
Public Comment Sheet

Your input on the proposed cleanup plan for the Pagel's Pit Superfund Site is important to EPA. Comments provided by the public are valuable in helping the EPA select a final cleanup for the site.

You may use the space below to write your comments, then fold and mail or fax your comments to Gordon Blum at (312) 353-1155. Comments must be postmarked on or before September 11, 1999. If you have any questions, please contact Gordon Blum at (312) 353-8501 or toll free at (800) 621-8431. Comments may also be sent via e-mail to the following address:
blum.gordon@epa.gov

SEE ATTACHED

Name _____
Address _____
City _____
State _____ Zip _____



Pagel's Pit Superfund Site Public Comment Sheet

Fold on dashed lines, tape, stamp, and mail

Name _____
Address _____
City _____ State _____
Zip _____

Place
Stamp
Here

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